

EXHIBIT 85

Court of Appeal Motion Nos. M47811 and M47813
Court of Appeal File Nos. C63309 and C63310

COURT OF APPEAL FOR ONTARIO

B E T W E E N:

DANIEL CARLOS LUSITANDE YAIGUAJE, BENANCIO FREDY CHIMBO GREFA,
MIGUEL MARIO PAYAGUAJE PAYAGUAJE, TEODORO GONZALO PIAGUAJE
PAYAGUAJE, SIMON LUSITANDE YAIGUAJE, ARMANDO WILMER PIAGUAJE
PAYAGUAJE, ANGEL JUSTINO PIAGUAJE LUCITANTE, JAVIER PIAGUAJE
PAYAGUAJE, FERMIN PIAGUAJE, LUIS AGUSTIN PAYAGUAJE PIAGUAJE, EMILIO
MARTIN LUSITANDE YAIGUAJE, REINALDO LUSITANDE YAIGUAJE, MARIA
VICTORIA AGUINDA SALAZAR, CARLOS GREFA HUATATOCA, CATALINA ANTONIA
AGUINDA SALAZAR, LIDIA ALEXANDRIA AGUINDA AGUINDA, CLIDE RAMIRO
AGUINDA AGUINDA, LUIS ARMANDO CHIMBO YUMBO, BEATRIZ MERCEDES
GREFA TANGUILA, LUCIO ENRIQUE GREFA TANGUILA, PATRICIO WILSON
AGUINDA AGUINDA, PATRICIO ALBERTO CHIMBO YUMBO, SEGUNDO ANGEL
AMANTA MILAN, FRANCISCO MATIAS ALVARADO YUMBO, OLGA GLORIA GREFA
CERDA, NARCISA AIDA TANGUILA NARVAEZ, BERTHA ANTONIA YUMBO
TANGUILA, GLORIA LUCRECIA TANGUILA GREFA, FRANCISCO VICTOR TANGUILA
GREFA, ROSA TERESA CHIMBO TANGUILA, MARIA CLELIA REASCOS REVELO,
HELEODORO PATARON GUARACA, CELIA IRENE VIVEROS CUSANGUA, LORENZO
JOSE ALVARADO YUMBO, FRANCISCO ALVARADO YUMBO, JOSE GABRIEL REVELO
LLORE, LUISA DELIA TANGUILA NARVAEZ, JOSE MIGUEL IPIALES CHICAIZA, HUGO
GERARDO CAMACHO NARANJO, MARIA MAGDALENA RODRIGUEZ BARCENES,
ELIAS ROBERTO PIYAHUAJE PAYAHUAJE, LOURDES BEATRIZ CHIMBO TANGUILA,
OCTAVIO ISMAEL CORDOVA HUANCA, MARIA HORTENCIA VIVEROS CUSANGUA,
GUILLERMO VINCENTE PAYAGUAJE LUSITANTE, ALFREDO DONALDO PAYAGUAJE
PAYAGUAJE and DELFIN LEONIDAS PAYAGUAJE PAYAGUAJE

Plaintiffs
(Appellants)

- and -

CHEVRON CORPORATION, CHEVRON CANADA LIMITED and
CHEVRON CANADA FINANCE LIMITED

Defendants
(Respondents)

**FURTHER SUPPLEMENTARY JOINT MOTION RECORD OF
CHEVRON CANADA LIMITED AND CHEVRON CORPORATION
(Motion for Security for Costs returnable June 27, 2017)**

June 23, 2017

GOODMANS LLP

Barristers & Solicitors
Bay Adelaide Centre
333 Bay Street, Suite 3400
Toronto, ON M5H 2S7

Benjamin Zarnett LSUC#: 17247M

bzarnett@goodmans.ca

Tel: 416-597-4204

Fax: 416-979-1234

Suzy Kauffman LSUC#: 41703D

skauffman@goodmans.ca

Tel: 416-597-6281

Fax: 416-979-1234

Lawyers for the Defendant (Respondent in Appeals), Chevron Canada Limited

OSLER, HOSKIN & HARCOURT LLP

Barristers & Solicitors
100 King Street West
1 First Canadian Place
Suite 6200, P.O. Box 50
Toronto, Ontario M5X 1B8

Larry Lowenstein LSUC#: 23120C

llowenstein@osler.com

Tel: 416-862-6454

Fax: 416-862-6666

Laura Fric LSUC#: 36545Q

lfric@osler.com

Tel: 416-862-5899

Fax: 416-862-6666

Lawyers for the Defendant (Respondent in Appeals), Chevron Corporation

**NORTON ROSE FULBRIGHT CANADA
LLP**

Barristers & Solicitors
Suite 3800
Royal Bank Plaza, South Tower
200 Bay Street, P.O. Box 84
Toronto, ON M5J 2Z4

Clarke Hunter, Q.C.

clarke.hunter@nortonrosefulbright.com

Tel: 403-267-8292

Fax: 403-264-5973

Anne Kirker, Q.C.

anne.kirker@nortonrosefulbright.com

Tel: 403-267-9564

Fax: 403-264-5973

Robert Frank LSUC#: 35456F

robert.frank@nortonrosefulbright.com

Tel: 416-202-6741

Fax: 416-360-8277

Lawyers for the Defendant (Respondent in Appeals), Chevron Corporation

TO: **LENCZNER SLAGHT ROYCE SMITH GRIFFIN LLP**

Barristers

130 Adelaide Street West, Suite 2600

Toronto, ON M5H 3P5

Alan J. Lenczner, Q.C. LSUC#: 11387E

alenczner@litigate.com

Tel: 416-865-3090

Fax: 416-865-9010

Brendan Morrison LSUC#: 61635B

bmorrison@litigate.com

Tel: 416-865-2842

Fax: 416-865-9010

Lawyers for the Plaintiffs (Appellants in Appeals)

AND TO: **KOSKIE MINSKY LLP**

Barristers & Solicitors

900 - 20 Queen Street West

Toronto, Ontario M5H 3R3

Kirk Baert LSUC#: 30942O

kbaert@kmlaw.ca

Tel: 416-595-2117

Fax: 416-977-3316

Celeste Poltak LSUC#: 46207A

cpoltak@kmlaw.ca

Tel: 416-595-2701

Fax: 416-977-3316

Co-counsel for the Plaintiffs (Appellants in Appeals)

AND TO: **LAX O'SULLIVAN LISUS GOTTLIEB LLP**

Barristers

145 King St. West, Suite 2750

Toronto, ON M5H 1J8

Terrence J. O'Sullivan LSUC#: 13354K

tosullivan@counsel-toronto.com

Tel: 416-598-3556

Fax: 416-598-3730

Paul Mitchell LSUC#: 39196J

pmitchell@counsel-toronto.com

Tel: 416-644-5359

Fax: 416-598-3730

Lawyers for Chevron Canada Capital Company

INDEX

TAB	DESCRIPTION	PAGE
1.	Letter from lawyers for Chevron Canada Limited and Chevron Corporation dated June 21, 2017	1
2.	Letter from lawyers for the Appellants dated June 22, 2017	12

1

OSLER

Osler, Hoskin & Harcourt LLP
Box 50, 1 First Canadian Place
Toronto, Ontario M5X 1B8
416.362.2111 MAIN
416.862.6666 FACSIMILE

Goodmans^{LLP}

Barristers & Solicitors

Bay Adelaide Centre
333 Bay Street, Suite 3400
Toronto, Ontario M5H 2S7

Telephone: 416.979.2211
Facsimile: 416.979.1234
goodmans.ca

June 21, 2017

Alan J. Lenczner, Q.C.
Lenczner Slaght LLP
Suite 2600, 130 Adelaide Street West
Toronto, ON M5H 3P5

Kirk M. Baert
Koskie Minsky LLP
20 Queen Street West
Suite 900, Box 52
Toronto ON M5H 3R3

SENT BY E-MAIL

Dear Messrs. Lenczner and Baert:

Yaiguaje *et al.* v. Chevron Corporation ("Chevron Corp.") and Chevron Canada Limited ("Chevron Canada")

Court File No. CV-12-9808-00CL; Court of Appeal Files Nos. C63309 and C63310

We are writing jointly on behalf of the defendants Chevron Corp. and Chevron Canada with regard to the June 27 security for costs motions brought by Chevron Corp. and Chevron Canada.

The defendants' motion records for the security for costs motions were served on May 2, 2017. On May 9, 2017, Mr. Lenczner advised Mr. Kolla, counsel for Chevron Canada, that the plaintiffs (responding parties) would not be filing any responding evidence on the security for costs motions and would not be cross-examining on the affidavits filed by the defendants. On this basis, the parties agreed upon a schedule, confirmed by email on May 12, 2017, to exchange factums on the security for costs motion, which schedule did not contemplate any evidence being filed by the plaintiffs.

The defendants delivered their factums on June 5, 2017, under the agreed upon schedule. The defendants noted in their moving factums that claims of impecuniosity must be supported by evidence, which the plaintiffs had failed to provide.

On June 19, 2017, we received the plaintiffs' factum and purported responding motion record that includes documents (in particular three settlement agreements with third party funders) that are not proven by affidavit. The responding motion record was delivered despite your advice that the plaintiffs would not be filing responding evidence and after Chevron Corp. and Chevron Canada had delivered their factums. The record is improper and the documents are not properly in evidence on these motions.

In the plaintiffs' factum there are a number of assertions that are made without any supporting evidence and which Chevron Corp. and Chevron Canada have reason to question. If the plaintiffs

Page 2

had properly introduced evidence to support its assertions, Chevron Corp. and Chevron Canada would have had the opportunity to test that evidence in cross-examination and provide reply evidence. Having been deprived that opportunity, and without prejudice to taking the position that the security for costs motions should proceed with the judge ignoring all such assertions in your factum, Chevron Corp. and Chevron Canada seek answers to the following questions for the purpose of the motion:

1. In respect of paragraph 25 of the plaintiffs' factum where it is asserted that "... neither the remediation trustee nor the indigenous appellants can fund the litigation. Chevron has known about past third party funding and has impeded any future funding.", please confirm:
 - (a) details of all current agreements, understandings or arrangements, between the plaintiffs, their counsel, their agents and any other party in any jurisdiction, whereby money or support of any kind is provided directly or indirectly in respect of the plaintiffs' litigation against the defendants or any other affiliate of Chevron Corp., including enforcement proceedings ("Funding") and supporting documentation;
 - (b) the identities and contact information of all entities providing Funding;
 - (c) details of all efforts by the plaintiffs to obtain Funding, whether successful or not, including all fundraising efforts (crowd sourcing etc.). Please see attached at Tab 1 screenshots of crowdfunding efforts in support of the plaintiffs' litigation;
 - (d) whether all previously received Funding has been exhausted on case-related expenditures; and
 - (e) the identities of all persons or entities with a current financial interest in these proceedings and the persons' or entities' current financial status.
2. In paragraph 26 of the respondents' factum, it is asserted that counsel for the plaintiffs are working on contingency. Please provide the following confirmation:
 - (a) details of the contingency arrangements between the plaintiffs and all Canadian counsel and/or other third parties, and supporting documentation including all retainer agreements;
 - (b) details of all payments made by the plaintiffs, their counsel, their agents or by any other party to all Canadian counsel since the commencement of this litigation in Canada, in respect of the plaintiffs' litigation against the defendants. The confirmation should reconcile to the information at Tab 2, which we are informed are documents produced by Josh Rizack during the RICO proceedings. Mr. Rizack

Page 3

was an accountant for the plaintiffs and their agents. Steven Donziger, counsel who acted for the plaintiffs, identified these as documents that Mr. Rizack prepared for Mr. Donziger to assist with tracking expenses related to the plaintiffs' litigation. You will see that significant payments to Lenczner Slaght are disclosed in these documents, as are funds paid to other Canadian counsel.

- (c) Details regarding how the \$118,498.19 received from the defendants (as payment for costs in respect of the appeals before the Ontario Court of Appeal and the Supreme Court of Canada arising from the motions challenging jurisdiction) was disbursed by counsel and plaintiffs (or others).
3. In paragraph 50 of the plaintiffs' factum, it is stated that if security for costs is awarded, that no more than \$50,000 should be ordered to be paid as security for costs. Please advise as to the identity (or identities) of the source of such funds, which we understand would be available to be posted as security. Please also confirm the source of the funds used to pay the costs award made by Nordheimer J. at Tab O of Chevron Corp.'s responding record.

Given that the hearing is fast approaching, please provide the answers by no later than 5 pm on Thursday, June 22, 2017. We reserve the right to rely on any responses, or the lack of a response, at the motion, or depending upon the responses, to insist upon the production of a witness with knowledge of the circumstances to be cross-examined.

OSLER, HOSKIN & HARCOURT LLP

GOODMANS LLP

Per:



Larry Lowenstein

Per:



Benjamin Zarnett

- c: Brendan Morrison (*Lenczner Slaght Royce Smith Griffin LLP*)
 Celeste Poltak, Garth Myers (*Koskie Minsky LLP*)
 Terrence O'Sullivan, Paul Michell (*Lax O'Sullivan Lisus Gottlieb LLP*)
 Clarke Hunter, Anne Kirker, Robert Frank (*Norton Rose Fulbright Canada LLP*)
 Laura Fric, Eric Morgan (*Osler Hoskin & Harcourt LLP*)
 Suzy Kauffman, Peter Kolla (*Goodmans LLP*)

TAB 1

THE CROWD vs.



CASES NEWS ABOUT

The Crowd vs. Chevron Oil Spill

01:03

Share this article

[@ pm](#)
[embed](#)
[f share](#)
[tweet](#)

€9,320 of €25,000

37% Funded, 153 Donors, 9 Days left

☐ 5
 ☐ 10
 ☒ 25
 ☐ 50
 ☐ 100

EUR USD

€ 25.00

DONATE NOW

WHATS THE CASE ABOUT CASE NEWS THE CROWD PARTICIPATE

The Crowd Claims

Chevron must clean up its mess in Ecuador.

Next legal action of the crowd

Seize the assets of Chevron in Canada, in order to collect the legitimate compensation of 9.5 billion US dollars, needed to clean up the contamination of 400,000 hectare Amazon rainforest and to set up a large health care program. To cover the ongoing costs for preparation of this upcoming legal step, scheduled in 2017, the crowd needs US \$28,000 (25.000 euro) by the end of 2017.

Summary

In 2011, the Ecuador National Court ordered Chevron to pay 9.5 billion US dollars to clean up 400,000 hectare of polluted Amazon rainforest and to set up a large health program. The contamination was arising due to inappropriate and outdated oil extraction methods between 1964 and 1995. Until now Chevron refuses to pay and has meantime stripped all its assets in Ecuador.

Legal progress

The Supreme Court decision in Canada allowed the victims to proceed with the enforcement in that country.

Case background and who The Crowd supports

Chevron left Ecuador years ago, but it "forgot" to take home the 16 billion gallons of toxic waste that contaminates streams and rivers relied on by local inhabitants for their drinking water, bathing, and fishing. After that, Chevron ignored the Ecuadorian National Court and refused to pay the 9,5 billion US dollars to clean the contamination of 400,000 hectare Amazon rainforest.

Legal Updates

2017-03-09

The Toronto Court judge who heard the case in Canada accepted a request by UDAPT (Unión de Afectados por Texaco), the Ecuadorian plaintiffs, in which they asked he deny Chevron the possibility of re-litigating all the arguments previously resolved by the Ecuadorian Courts. The judge ruled in favor of those affected. With this pronouncement the UDAPT, members of indigenous communities of Ecuador, advance with their iconic case, already enduring over 23 years of litigation. The Canadian Court decision may be interpreted, says Pablo Fajardo, the attorney of the Ecuadorian affected people, as "an acceptance by the judge of the validity of the sentence issued by the Ecuadorian Courts". This decision also stops Chevron from causing unnecessary delays. Fajardo acknowledged that the judge did accept the argument presented by the oil company's lawyers that Chevron Canada and Chevron Corporation are different companies. However, Fajardo expects this decision to be appealed and thinks "it will surely be reversed."

2017-01-18

The judge in Canada is deciding upon whether Chevron is only allowed to bring in their arguments that were allowed by the Ecuadorian Court, or that Chevron is able to bring in all new arguments, that were earlier withheld by the Equadorian Court . We are positive about the chance that it will be the former, but we are waiting for the decision.

2016-09-29



The Crowd Versus

@TheCrowdVersus

Follow

Ecuador Case: Focus Shifts to Canada Where
Enforcement Hrg Targeting Chevron Assets
Begins MONDAY go.shr.lc/2cWmO3T
#ChevronCleanUp

6:49 PM - 14 Sep 2016



Reply to @TheCrowdVersus

Trends

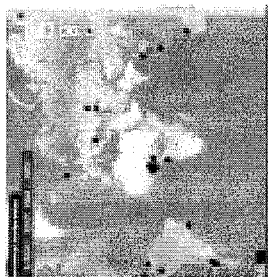
#FatTuesday Amazon S3 #Oscars 1 Jamaal Charles Adrian Peterson Bengie Gonzalez
Scott Kingery #openbadges Cody Sedlock Lauren London

© 2017 Twitter About Help Center Terms Privacy policy Cookies Ads info

 **The Crowd Versus**
@TheCrowdVersus

 Follow

And here's how you can help: @Grrrowd you
can donate to stand for #ClimateJustice
#ChevronCleanUp



EnvironmentalJustice @EnvJustice

Here's why we need an #antichevron day ejolt.org/2016/05/chevro...
... and here's how we mapped them ejatlas.org/company/chevro...

RETWEET

1



4:21 PM - 21 May 2016

TAB 2

Total Case Expenditures by Entity 2007-2013

Category	Entity	TOTAL
US Legal	Keker Van Nest LLP	3,700,000.00
US Legal	Smyser Kaplan Veselka	2,900,000.00
US Legal	Patton Boggs	2,158,143.85
US Legal	Kohn Swift	1,500,000.00
Enforcement	Nextant LLC	1,332,715.47
Ecuador Legal	Selva Viva Cia.Ltda	1,213,000.00
Misc.	Payments to Others and Case Expenses (Donziger)	1,151,580.81
Legal for Case Support	Purrington Moody Wells (Carmody)	909,100.00
US Legal	Freidman Kaplan Sella	771,525.98
US Legal	Gerald B Lefcourt	749,188.71
Enforcement	Enrique (Blaker Brooks)	450,000.00
US Legal	Emery Celli Brinckerhoff & ABANEW	395,972.89
Fund Raising	Julian Jarvis	390,627.79
Admin/Legal/Support	Andrew M Woods (includes ADP payroll fees/Taxes)	359,317.44
Advocacy/PR	Karen Hinton	358,211.78
Ecuador Legal	Pablo Estenio Fajardo Mendoza	294,661.30
Advocacy/PR	Amazon Watch	272,400.00
Enforcement	Lenczner Slaght	234,361.96
Enforcement	Miranda y Amado	195,000.00
Admin/Legal/Support	Aaron M Page	194,762.36
Fund Raising	Hassans Gibraltar	160,114.95
Fundraising/Case Support	Rizack/Rising Group	156,636.99
US Legal	David Sherman (Keker)	125,000.00
Admin/Legal/Support	Erion Graham	119,390.21
US Litigation Support	Stratus Consulting	108,567.38
US Litigation Support	Lexolution	100,000.00
Advocacy/PR	Digitalis Media	97,086.07
Enforcement	Tinoco	78,958.82
US Litigation Support	Rhino Imaging	75,461.91
US Legal	Jay Horowitz	65,812.62
Advocacy/PR	Shimmerlik Corp	60,152.66
Enforcement	Neal & Harwell	60,000.00
Advocacy/PR	Kerry Kennedy	50,000.00
US Legal	The Weinberg Group	50,000.00
Advocacy/PR	Oil Change International	49,500.00
US Legal/Investigation	Grant Fine/Fine & Assoc	42,500.00
Advocacy/PR	Lou Dematteis	41,000.00
Enforcement	Sergio Bermudes (Brazil)	40,353.43
Enforcement	Cardenas & Cardenas (Colombia)	40,242.17

Payment Request		3/14/12								
Page #	PAYEE	AMOUNT €	AMOUNT \$	INVOICE REF (ATTACHED)	WITHIN APPROVED BUDGET CAPS.	ENGAGEMENT REF (ATTACHED UNLESS PREVIOUSLY PROVIDED)	APPROVED BY STEERING COMMITTEE	Comments		
	Saba Vico		\$ 43,000.00		Yes	Previously Provided	Steven Donziger			
	Equador Local Counsel		\$ 25,000.00		Yes	Previously Provided	Steven Donziger			
	Amazon Watch (air Pension, London)		\$ 21,200.00		Yes	Previously Provided	Steven Donziger			
	Sin Grass		\$ 10,000.00		Yes	Previously Provided	Steven Donziger			
	Leicester Slaughter, Joyce Smith Griffin LLP		\$ 122,380.33		Yes	Previously Provided	Steven Donziger			
	Kelst & Van Nest LP		\$ 150,000.00		Yes	Previously Provided	Steven Donziger			
	Law Offices of Steven Donziger		\$ 75,000.00		Yes	Previously Provided	Steven Donziger			
	Karen Hinton		\$ 34,000.00		Yes	Previously Provided	Steven Donziger			
	Alison Watt Page		\$ 20,226.00		Yes	Previously Provided	Steven Donziger			
	Graham Erion		\$ 15,000.00		Yes	Previously Provided	Steven Donziger			
	Nestart LLC		\$ 105,000.00		Yes	Previously Provided	Steven Donziger			
	The Rising Group Consulting, Inc.		\$ 5,000.00		Yes	Previously Provided	Steven Donziger			
	Brezhou Fernandez Madero & Lombardi		\$ 18,140.00		Yes	Previously Provided	Steven Donziger			
	Producers Nueva		\$ 15,000.00		Yes	Previously Provided	Steven Donziger			
			\$ 665,946.33							

2

June 22, 2017

Alan J. Lenczner, Q.C.
Direct line: 416-865-3090
Direct fax: 416-865-2844
Email: alenczner@litigate.com

VIA E-MAIL

Benjamin Zarnett
Goodmans LLP
333 Bay Street, Suite 3400
Toronto, ON M5H 2S7

Larry Lowenstein
Osler, Hoskin & Harcourt
1 First Canadian Place
P.O. Box 50, Stn. 1st Can. Place
Toronto, ON M5X 1B8

Dear Counsel:

RE: Aguinda et al v. Chevron Corporation et al
Our File No.: 43222

I acknowledge receipt of your letter of June 21, 2017.

I disagree that the Settlement Agreements are new evidence. The appellants are complete strangers to those Agreements. The appellants could not have filed a meaningful Affidavit. The appellants learned of them by the wide publicity given to them by Chevron Corp. through its press releases and by other means. The Settlement Agreements are signed on behalf of Chevron Corp. by its Assistant Secretary Kari Endries or by its counsel. The Settlement Agreements are documents unchallengeable by Chevron Corp. Chevron Corp. widely publicized these Agreements obviously to warn any prospective funder to be aware of the litigation that would ensue if a funder engaged in funding.

The fee contingency arrangements that Lenczner Slaght and Koskie Minsky have is to reimburse these firms at the rate of \$1,000 per docketed hour.

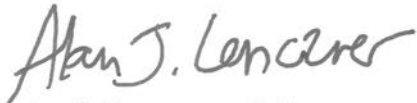
The \$118,000 that the appellants received as costs for their successful appeals before the Ontario Court of Appeal and before the Supreme Court of Canada has been utilized for disbursements, including, paying:

- (a) HST;
- (b) the costs awarded by Nordheimer, J to Chevron Corp.;

June 22, 2017

- (c) Very significant printing and photocopying costs for the prior Court of Appeal and Supreme Court of Canada proceedings, the proceedings before Hainey, J and before the Court of Appeal;
- (d) courier charges for serving materials and court fees; and
- (e) expenses for the travel and hotel bills for a trip to the Supreme Court of Canada and a trip to Ecuador.

Yours very truly,

A handwritten signature in dark ink, reading "Alan J. Lenczner". The signature is fluid and cursive, with the first name "Alan" and last name "Lenczner" clearly legible.

Alan J. Lenczner, Q.C.

AL/ej

cc. Kirk Baert / Celeste Poltak / Garth Myers
Robert Frank
Brendan Morrison

DANIEL CARLOS LUSITANDE - and - CHEVRON CORPORATION *et al.*
YAIGUAJE *et al.*
Plaintiffs (Appellants) Defendants (Respondents)

Court of Appeal Motion Nos. M47811 & M47813
Court of Appeal File Nos. C63309 & C63310

COURT OF APPEAL FOR ONTARIO

Proceeding commenced at Toronto

**FURTHER SUPPLEMENTARY JOINT MOTION
RECORD OF CHEVRON CANADA LIMITED AND
CHEVRON CORPORATION
(Motion for Security for Costs)**

GOODMANS LLP

Barristers & Solicitors
Bay Adelaide Centre
333 Bay Street, Suite 3400
Toronto, ON M5H 2S7

Benjamin Zarnett LSUC#: 17247M

bzarnett@goodmans.ca

Suzy Kauffman LSUC#: 41703D

skauffman@goodmans.ca

Tel: 416.979.2211

Fax: 416.979.1234

Lawyers for the Defendant (Respondent in Appeals),
Chevron Canada Limited